REMARKS

Applicants respectfully traverse and request reconsideration.

Applicants have amended the title to correctly correspond to the title on the Abstract page and in the original signed Declaration.

Applicants' Attorney wishes to thank Examiner Ho for the courtesies extended during the telephone conference of February 3, 2004.

Applicants submit herewith amended Claims 1 and 10 to correct various informalities relating to proper antecedent basis. In addition, Figure 2 has been amended by Applicants to correct the arrow labeled number 1. Furthermore, Applicants have amended informalities on Pages 5-7 and in the Abstract. Applicants respectfully note that no new subject matter has been introduced in the aforementioned amendments.

Claims 1-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the admitted prior art in view of Park, US Patent Number 6,081,891 ("Park"). Generally speaking, Park is directed to a video BIOS loading apparatus and a control method thereof which eliminates the need of manually resetting a jumper when replacing an existing video card with a new video card (See Abstract). Because Park is directed to an apparatus and method *for upgrading a video BIOS when an existing video card is replaced*, Park does not seem to be directed at a computer system *for operating a plurality of display devices* as required by Applicants' Claim 1 (See preamble of Claim 1, emphasis added). Moreover, Park fails to disclose a processing unit and video driver for the first video adapter that performs the operation as required by Applicants' Claim 1. For example, the system of Park appears to only store one video BIOS in memory. In contrast, Applicants' Claims require, among other things, storing multiple video BIOSs in memory and overwriting and copying video BIOSs in a certain manner as claimed.

Because Park does not teach, suggest or disclose the limitations of Applicants' Claim 1, and moreover, does not appear to be directed at a computer system for operating a plurality of display devices, it is respectfully submitted that no combination of Park and the admitted prior art renders obvious Applicants' Claim 1.

As previously stated, Park is directed at a video BIOS loading apparatus and a control method associated therewith that eliminates the inconvenience of manually upgrading the video BIOS when one replaces an existing video card. With reference to Figure 1, Park discloses a video BIOS loading apparatus that includes, *inter alia*, a system bus connected to a variety of peripheral devices such as a CPU, RAM, ROM, video controller, peripheral device, and an expansion slot. The reference teaches that upon start-up, a system BIOS stored in ROM (Figure 1, element 120) is read into the CPU (element 100). The CPU then checks the video BIOS, also stored in ROM, and determines whether or not an option card (a.k.a., a video card as depicted by element 170) has been engaged in an expansion slot (element 160). If a video card is not present in the expansion slot, the CPU loads the video BIOS stored in ROM into the RAM via the bus and the process ends. (Column 3; Lines 32-44).

However, if a video card is found in an expansion slot, the CPU then determines whether or not the video card includes a video card BIOS as depicted by Element 172. Similar to the case where the video card is not engaged in an expansive slot, the CPU will merely load the video BIOS stored in ROM into RAM via the system bus if a video card BIOS is not included in the video card. (Column 3, Lines 44-50). If, however, the video card BIOS exists, then the CPU reads an identification code of the video card BIOS and determines whether or not the video card is another company's product. If the video card

BIOS is not another company's product, then the CPU determines whether it is a more recent version of the current video BIOS. If the video card BIOS is not more recent, then the original video BIOS stored in ROM will be loaded into RAM via the system bus. However, in the event that the video card BIOS is not another company's product, but is a more recent version, then the CPU loads the video card BIOS into RAM via the system bus. In the event that the video card BIOS is another company's product, then the CPU will load the video card BIOS into RAM via the system bus. (Column 3; Line 50 – Column 4; Line 4).

By following this approach, Park teaches that the reference avoids the inconvenience of forcing a user to manually change the settings in order to reset a computer system to use an upgraded video BIOS or a different video BIOS when he replaces an existing video card with an upgraded video card of the same company or a video card by a different company. (Column 2; Lines 5-10).

In summary, Park discloses the use of only one video card BIOS in the system and therefore fails to disclose a computer system for operating a plurality of display devices comprising, *inter alia*, a computer system that uses "at least one of the first and second video adapters to display information on at least one display device connected to the computer." (Claim 1). Furthermore, Park fails to disclose a processing unit as described by Applicants' Claim 1. Claim 1 requires *inter alia*, a processing unit, "as directed by the system BIOS, executing a POST (power on self test) during which the system BIOS stores the first video BIOS in a first memory area in the system memory of the computer system, and copies the first video BIOS to a second memory area in the system memory, when the first video adapter is a secondary video adapter and the second

video adapter is the primary video adapter, thereafter, the second video BIOS being stored in the first memory area, thereby overriding the first video BIOS and the first memory area."

To the extent that Park can be compared to this recital, as listed in Applicants' Claim 1, Park merely discloses the practice of loading one of two potentially available video BIOSs (*i.e.*, one of either a video BIOS or a video card BIOS) into a RAM device. Park does not appear to teach the practice of then copying a BIOS to a second memory area in the system memory and thereafter storing the other video BIOS in the first memory area thereby overriding the first video BIOS. (Claim 1). Instead, Park merely discloses the practice of determining whether or not a video card BIOS is engaged in an expansive slot and then loads only one video BIOS into RAM.

Moreover, Park does not disclose a video driver for the first video adapter or its associated operation as required by Claim 1. Applicants are unaware of any reference to a video driver in the Park reference. In addition, Applicants are unable to find structure within the Park reference that copies a first video BIOS from a second memory area to a third memory area in the system memory. Applicants maintain that Park does not disclose or render obvious any of the limitations associated with a processing unit and video driver as required by Applicants' Claim 1.

In addition, Applicants respectively submit that the Office Action does not appear to provide proper motivation to combine the references. The Office Action appears to state that the combination would provide a system the ability "to use multiple video BIOSs in the system when a new video BIOS is present, therefore prevent[ing] wast[e] of valuable memory space." (Page 3, ¶ 2). However, as stated above, no combination of

Park and the admitted prior art would provide a computer system the ability to operate multiple display devices for multiple displays. Furthermore, preventing the waste of valuable memory space is not a necessary prerequisite or claimed goal of the invention. The claimed invention, as discussed in Applicants' Specification is designed to provide operating systems the ability to operate multiple display devices. (Page 4, Lines 1-2). While the Office Action states that combining the two prior art references would prevent the waste of valuable memory space, Applicants maintain that combining the prior art references would neither render obvious each and every claim limitation associated with Applicants' Claim 1, nor would it operate in a computer system providing a plurality of display devices. Accordingly, the claim is believed to be allowable.

With respect to Claims 2-9, Applicants respectfully repeat the relevant remarks made above with respect to Claim 1. Moreover, Applicants respectfully note that each of Claims 2-9 adds patentable and non-obvious subject matter to allowable Claim 1. Furthermore, Applicants note that Park does not appear to disclose storing, copying, overwriting or transferring video BIOSs in compressed or decompressed form as is suggested by the Office Action. Applicants respectfully request a showing within the Park reference where Applicants' claim limitations are taught, disclosed or suggested.

Applicants respectfully stress that Park does not teach or suggest any of Applicants' Claim 1 and does not appear to be properly combinable with the admitted prior art. Any combination of the two references would fail to operate a computer system capable of providing a plurality of display devices. For these reasons, Applicants respectfully believe that Claims 2-9 are in proper condition for allowance.

With respect to Claims 10-20, Applicants respectfully repeat the relevant remarks made above. Claims 10-20 appear to be in proper condition for allowance.

Applicants respectfully submit that the claims are in condition for allowance, and an early Notice of Allowance is earnestly solicited. The Examiner is invited to telephone the below-listed attorney if the Examiner believes that a telephone conference will expedite the prosecution of the application.

Respectfully submitted,

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Annotated Sheet Showing Changes

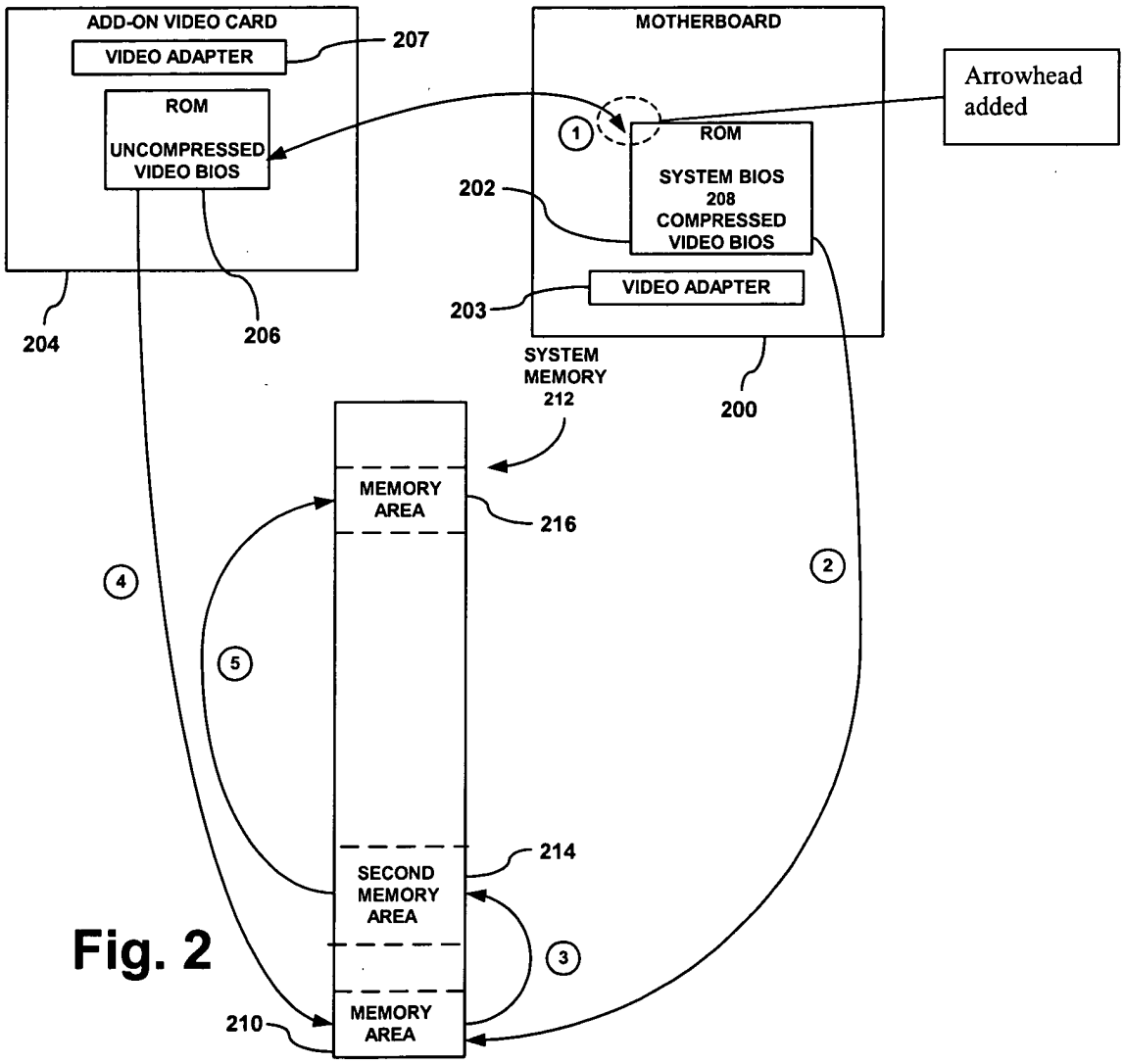

Fig. 2